

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

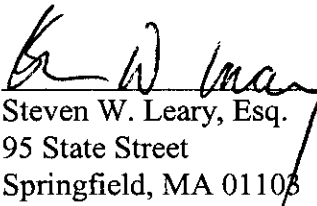
ALBERT INNARELLI, ET AL,  
DEFENDANTS

MOTION OF DEFENDANT MICHAEL BERGDOLL  
TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant Michael Bergdoll and moves that the conditions of his pre-trial release restricting his travel to the Commonwealth of Massachusetts be modified. The defendant seeks permission to attend a used construction equipment and tool auction to be held in North Franklin, CT on November 4<sup>th</sup> and 5<sup>th</sup>, 2004. The defendant has attended this auction in the past and purchases used equipment and/or tools to be used in connection with his business. Counsel for the defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the defendant respectfully that the within motion be allowed.

The Defendant  
Michael Bergdoll  
By his attorney

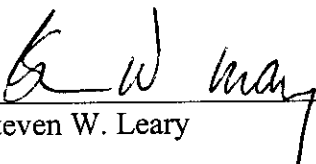
  
Steven W. Leary, Esq.  
95 State Street  
Springfield, MA 01103  
Tel. 413-737-1489  
Fax. 413-733-0238  
BBO# 290 520

*Michael Y. 2004. Accepted.  
Kurt D. Hume w/m*

CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

November 4, 2004

  
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Steven W. Leary